

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Irving Navarro

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 22, 2020 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

*Code Section*Title 18 United States Code,
Section 922 (a)(6)*Offense Description*Knowingly Make False Statements in Connection with the Purchase of a
Firearm

This criminal complaint is based on these facts:

See Attached Sheet...

☒ Continued on the attached sheet./s/ Shaun Insley*Complainant's signature*Shaun Insley Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 08/24/2020*Judge's signature*City and state: Laredo, TexasDiana Song Quiroga, U.S. Magistrate Judge*Printed name and title*

ATTACHMENT A

On August 22, 2020, United States Customs and Border Protection (CBP) at the Laredo International Port of Entry (POE) Bridge in Laredo, Texas, encountered Irving NAVARRO who was crossing into the United States from Mexico on foot. CBP received an alert originating from the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) requesting notification if NAVARRO attempted to cross into the United States. CBP contacted ATF regarding NAVARRO's attempted entry into the United States. ATF instructed to allow NAVARRO to proceed through the POE.

ATF placed an alert on NAVARRO due to his involvement with the straw purchases of firearms from three sporting goods stores, registered as being federally firearm licensees (FFLs) by ATF, in Laredo, Texas between December 2019 and July 2020. On August 20, 2020, ATF received information that NAVARRO had initiated the process to purchase a firearm and believed he was returning on August 22, 2020 to complete the purchase.

After instructing CBP to allow NAVARRO through the POE, ATF began surveillance on the sporting goods store where NAVARRO initiated the firearms purchase two days prior, located at the 5700 block of San Bernardo in Laredo, TX. ATF observed NAVARRO inside the store completing his purchase of the firearm. ATF Special Agents made contact with NAVARRO after he completed the purchase and was in possession of the firearm.

ATF read NAVARRO his Miranda Rights, and he agreed to answer ATF's questions. NAVARRO admitted that he used false information on the Firearm Transaction Record, ATF Form 4473. NAVARRO admitted that he gave a false residence, that he was not the intended buyer/purchaser of the firearms and that he was purchasing for another person. NAVARRO stated he received money and a description of the firearm to purchase for an individual in Mexico. NAVARRO admitted that he knew the firearm he purchased was going to be smuggled into Mexico.

The firearm that NAVARRO purchased on August 22, 2020 was a Smith & Wesson, model M&P Bodyguard 380, .380 ACP caliber pistol, with serial number KFW5097.